

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address WEILAND GOLDEN GOODRICH LLP Jeffrey I. Golden, State Bar No. 133040 jgolden@wglp.com Faye C. Rasch, State Bar No. 253838 frasch@wglp.com Ryan W. Beall, State Bar No. 313774 rbeall@wglp.com 650 Town Center Drive, Suite 600 Costa Mesa, CA 92626 Telephone: (714) 966-1000 Facsimile: (714) 966-1004 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Thomas H. Casey, Chapter 7 Trustee	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: 779 STRADELLA, LLC, a Delaware limited liability company, <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 8:16-bk-15156-CB ADVERSARY NO.: 8:18-ap-01076-CB CHAPTER: 7
THOMAS H. CASEY, Chapter 7 Trustee of the Estate of 779 Stradella, LLC, <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> PAUL J. MANAFORT, an individual, and JEFFREY YOHAI, an individual <div style="text-align: right;">Defendant(s).</div>	UNILATERAL STATUS REPORT [LBR 7016-1(a)(2)] DATE: 05/07/2019 TIME: 1:30 p.m. COURTROOM: 5D ADDRESS: 411 W. Fourth Street Santa Ana, CA 92701

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|---|------------------------------|--|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

The parties had reached a settlement to be heard at the same date and time. The settlement resolves the adversary proceeding with respect to the property and Mr. Manafort. Mr. Yohai did not join in the settlement, but retains no rights to the property. At the previous hearing, the Court continued the settlement motion so as to secure an agreement with Mr. Manafort alone. Unfortunately, while attempting to obtain Mr. Manafort's approval and signature on the agreement, he was re-incarcerated and the Trustee has been unable to obtain his approval.

The only remaining issue in the adversary proceeding, if the Court grants the motion for compromise, is serving the complaint and summons on Mr. Yohai. The Trustee has just recently determined the appropriate method for serving Mr. Yohai, and has concurrently with this status report filed a request for alias summons.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff

Defendant

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff

Defendant

3. When do you expect to complete your discovery efforts?

Plaintiff

Defendant

4. What additional discovery do you require to prepare for trial?

Plaintiff

Defendant

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff

Defendant

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff

Defendant

3. How many exhibits do you anticipate using at trial?

Plaintiff

Defendant

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☐ is ☒ is not requested
Reasons:

The adversary proceeding will be resolved if the settlement is approved by the Court.

Defendant

Pretrial conference ☐ is ☐ is not requested
Reasons:

Plaintiff

Pretrial conference should be set after:
(date) _____

Defendant

Pretrial conference should be set after:
(date) _____

E. SETTLEMENT:

1. What is the status of settlement efforts?

A settlement is before the Court at the same date and time.

2. Has this dispute been formally mediated? ☐ Yes ☒ No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff

☐ Yes ☐ No

Defendant

☐ Yes ☐ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

Defendant

☐ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

The Trustee has had problems serving the Mr. Yohai who remains in prison. Due to the nature of serving an inmate, the Trustee has so far been unable to serve Mr. Yohai with a summons that has not expired. Trustee has finally worked out a method of serving Mr. Yohai without the need for substituted service or another type of service that may not be effective, and will be serving the complaint on Mr. Yohai as soon as a new summons is issued. Trustee has, concurrently with this status report, filed requests for alias summons to facilitate service on Mr. Yohai.

The Trustee apologizes for the late filed status report. The final issue to be resolved in the adversary proceeding is serving Mr. Yohai which will be accomplished without requiring a motion for substituted service.

Respectfully submitted,

Date: 05/02/2019

WEILAND GOLDEN GOODRICH LLP

Printed name of law firm

/s/ Ryan W. Beall

Signature

Ryan W. Beall

Printed name

Attorney for: Thomas H. Casey, Chapter 7 Trustee

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600
Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 05/02/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ryan W Beall rbeall@lwgflp.com, vrosales@wgllp.com;kadele@wgllp.com

Thomas H Casey (TR) msilva@tomcaseylaw.com, thc@trustesolutions.net

Marc C Forsythe kmurphy@goeforlaw.com, mforsythe@goeforlaw.com;goeforecf@gmail.com

Jeffrey I Golden jgolden@wgllp.com, kadele@wgllp.com;vrosales@lwgflp.com;cbmeeker@gmail.com

Faye C Rasch frasch@wgllp.com, kadele@wgllp.com;tziemann@wgllp.com

David B Shemano dshemano@shemanolaw.com

United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 05/02/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* 05/02/2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY

The Honorable Catherine Bauer
United States Bankruptcy Court
411 W. Fourth Street, Courtroom 5D
Santa Ana, CA 92626

☐ Service information continued on attached page

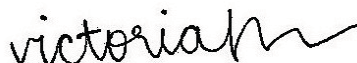
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/02/2019

Victoria Rosales

Date

Printed Name



Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.